

Comments, February 9, 2018

Draft Program Comment for the Federal Communications Commission's Review of Collocations on Certain Towers Constructed Without Documentation of Section 106 Review (FR 83, No. 7)

Alaska Office of History & Archaeology, Judith E. Bittner, Alaska State Historic Preservation Officer

Page	Paragraph / Line	Comment
1218	¶ 2, Lines 8-20: "Accordingly, a large number of towers constructed during the period between the effective dates of the two NPAs—that is, those for which construction began after March 16, 2001, and before March 7, 2005—do not have documentation demonstrating compliance with the Section 106 review process (<i>an issue exacerbated by the limitations of State Historic Preservation Officer' (SHPOs') record-keeping as well as subsequent changes in tower ownership.</i>)"	Replace "Accordingly, . . . (an issue exacerbated by the limitations of State Historic Preservation Officers' (SHPOs') record-keeping . . .) with: <i>(an issue exacerbated by subsequent changes in tower ownership).</i> There are multiple factors that led to the current state of affairs. SHPOs should not be singled out to blame for an absence of compliance documentation with Section 106 for tower construction and antenna collocation and should not be held responsible for towers that never completed a Section 106 review.
1218	7, Lines 6-8: "... no adverse effects from these towers have been brought to the FCC's attention."	Absence of evidence is not evidence of absence. Onus should be placed with the FCC to self-report foreclosure and identify if and where adverse effects have occurred. The passage of time does not diminish an adverse effect.
N/A	N/A	Since few communications providers in Alaska complied with Section 106 prior to 2010, our knowledge of the locations of cell towers in Alaska is limited. Many cell towers were installed in isolated communities that are only sporadically visited by SOI qualified individuals there to conduct project-specific investigations. <i>Please add a requirement that the latitude/longitude coordinates of a Twilight Tower be sent to the respective SHPO when antennas on the tower are replaced or added.</i>